REMARKS

In the Final Office Action[1], the Examiner objected to the specification; rejected

claims 1 and 3-31 under 35 U.S.C. §103(a) as being anticipated by "Microsoft Windows

XP Operating System" ("*Microsoft*") in view of Karp, David A. et al, "Windows XP in a

Nutshell," April 2002, O'Reilly First Edition ("*Karp*"); and rejected claims 3-7, 20, and 21

under 35 U.S.C. §103(a) as being obvious over *Microsoft* in view of *Karp* further in view

of U.S. Patent Application Publication 2004/0243616 to Benhase et al. ("*Benhase*").

Applicants have amended claims 1, 3-5, 8-13, 15-20, 22-27, and 29-31, and

added claims 32-37. Claims 1 and 3-37 are pending in the application.

I. Regarding the objection to the specification

The Examiner objected to the specification as failing to provide proper

antecedent basis because "[t]here is a mention of 'machine readable storage,'

but the term 'computer-readable storage medium' is not found in the

specification." (Office Action at page 2). Applicants have amended the

specification to conform terminology between the claims and the specification,

and to clarify that the claims do not cover a propagated signal. No new matter

has been added. Therefore, Applicants respectfully request that the Examiner

withdraw the objection to the specification.

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[1] The Office Action contains a number of statements reflecting characterizations of the related art and the
claims. Regardless of whether any such statement is identified herein, Applicants decline to
automatically subscribe to any statement or characterization in the Office Action.

II. Regarding the rejection of claims 1 and 3-31 under 35 U.S.C. § 103(a) as being unpatentable over *Microsoft* in view of *Karp*

Applicants respectfully request that the Examiner reconsider and withdraw

the rejection of claims 1 and 3-31 because a *prima facie* case of obviousness

has not been established with respect to these claims.

To establish a *prima facie* case of obviousness, the prior art, even if combined,

must teach or suggest all the claim limitations. *See* M.P.E.P. § 2143.03, 8th Ed., Rev. 6

(September 2007). Moreover, "in formulating a rejection under 35 U.S.C. § 103(a)

based upon a combination of prior art elements, it remains necessary to identify the

reason why a person of ordinary skill in the art would have combined the prior art

elements in the manner claimed." USPTO Memorandum from Margaret A. Focarino,

Deputy Commissioner for Patent Operations, May 3, 2007, page 2.

A *prima facie* case of obviousness has not been established because,

among other things, the prior art, when taken alone or in combination, fails to

teach or suggest each and every element of Applicants' claims.

For example, claim 1, as amended, recites a computer program product

including, for example, instructions operable to cause a data processing

apparatus to execute a method comprising:

> detecting a user navigation input comprising one of a
> forward user navigation input or a backward user navigation input,
> a forward user navigation input comprising a forward modifier key
> press combined with a key press of a group identifier character,
> and a backward user navigation input comprising a backward
> modifier key press combined with a key press of a group identifier
> character;

Microsoft fails to teach at least this element.

The Examiner alleges that *Microsoft* discloses a user navigation input having a group identifier as "Document1" in Figure 2 and "3 Main" in Figure 5. The Examiner further alleges that *Microsoft* teaches forward and backward navigation keys as arrow, Tab, and (Shift + Tab) keys. (Office Action at page 3). Even assuming these allegations are correct, which Applicants do not concede, the navigation keys discussed by the Examiner do not include both a group identifier key and a forward or backward modifier key. Any navigation keys that could be employed by the user in Figure 5 of *Microsoft*, as well as the cited arrow, Tab, and (Shift + Tab) keys, do not comprise both a forward or backward modifier key press and a key press of a group identifier character. Therefore, *Microsoft* does not teach or suggest that "the forward user navigation input comprises a forward modifier key press combined with a key press of a first group identifier character, and the backward user navigation input comprises a backward modifier key press combined with a key press of a second group identifier character," as recited in claim 1.

Karp does not cure the deficiencies of *Microsoft*. *Karp* is a reference guide for Windows XP. Applicants submit that *Karp* does not teach or suggest that "the forward user navigation input comprises a forward modifier key press combined with a key press of a first group identifier character, and the backward user navigation input comprises a backward modifier key press combined with a key press of a second group identifier character," as recited in claim 1.

Accordingly, the prior art fails to establish a *prima facie* case of obviousness with respect to claim 1, at least because the prior art fails to teach or suggest each and every element of the claim. Claim 1 is therefore allowable for at least the reasons presented above. Claims 3-8 are also allowable at least due to their dependence from claim 1.

Independent claims 9, 13, 18, 23, and 27, though of different scope from claim 1, recite limitations similar to those set forth above with respect to claim 1. Claims 9, 13, 18, 23, and 27 are therefore allowable for at least the reasons presented above. Claims 10-12, 14-17, 19-22, 24-26, and 28-31 are also allowable at least due to their dependence from claims 9, 13, 18, 23, and 27, respectively.

III. Regarding the rejection of claims 3-7, 20, and 21 under 35 U.S.C. § 103(a) as being unpatentable over *Microsoft* in view of *Karp* further in view of *Benhase*

Applicants respectfully request that the Examiner reconsider and withdraw the rejection of claims 3-7, 20, and 21 because a *prima facie* case of obviousness has not been established with respect to these claims.

The Examiner relies on *Benhase* for allegedly disclosing the various elements recited in claims 3-7, 20, and 21. See Office Action at pages 12-13. Even assuming this allegation is correct, which Applicants do not concede, *Benhase* does not teach or suggest "the forward user navigation input comprises a forward modifier key press combined with a key press of a first group identifier character, and the backward user navigation input comprises a backward modifier key press combined with a key press of

a second group identifier character," as recited by independent claim 1, and similarly recited by independent claim 18, and required by dependent claims 3-7, 20, and 21.

Because the prior art, when taken alone or in combination, fails to teach or suggest each and every element recited by independent claims 1 and 18 and required by dependent claims 3-7, 20, and 21, no *prima facie* case of obviousness has been established with respect to claims 3-7, 20, and 21. Accordingly, Applicants respectfully request that the Examiner withdraw the rejection of claims 3-7, 20, and 21 under 35 U.S.C. § 103(a) as being unpatentable over *Microsoft* in view of *Karp* further in view of *Benhase.*
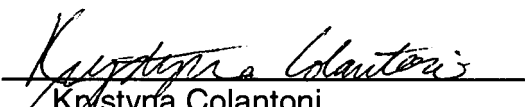
IV. Conclusion

In view of the remarks, Applicants respectfully request reconsideration and reexamination of this application and the timely allowance of the pending claims.

Please grant any extensions of time required to enter this response and charge any additional required fees to our deposit account 06-0916.

Respectfully submitted,

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GARRETT & DUNNER, L.L.P.

Dated: October 17, 2007

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